

570 Lexington Avenue, Suite 3500 New York, NY 10022

Kenneth A. Caruso Special Counsel 212-466-6401 <u>Ken.caruso@mfsllp.com</u>

August 14, 2023

VIA ECF

Honorable Paul G. Gardephe United States District Judge United States Courthouse 40 Foley Square New York, NY 10007

Re: EMERGENCY TRAVEL REQUEST

United States v. Gulkarov, et al. (Deft. Robert Wisnicki), 22 Cr. 020 (PGG)

Dear Judge Gardephe:

We represent Defendant Robert Wisnicki. We submit this letter to request a modification of the conditions of Mr. Wisnicki's release on bail.

Mr. Wisnicki's grandmother died in Los Angeles, California. We respectfully ask the Court to permit Mr. Wisnicki to travel there today, or as soon as he can leave New York, returning to New York on August 17, 2023. The purpose of the travel is to attend the funeral and related family events.

AUSA Allison and Pretrial Services consent to this request.

Respectfully submitted,

/s/ Kenneth A. Caruso
Kenneth A. Caruso

cc: AUSA Mathew Andrews

AUSA Ryan Allison

Pretrial Services Officer Robert Stehle (via email)

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe, U.S.D.J.

Dated: August 14, 2023